

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	CRIMINAL NO. 4:20-CR-00472
	§	
v.	§	
	§	
JIMMY VILLALOBOS-GOMEZ,	§	
a/k/a “Duchi,” a/k/a “Duchy,” and	§	
	§	
WALTER ANTONIO CHICAS-GARCIA,	§	
a/k/a “Walter”	§	

GOVERNMENT’S MOTION TO DISMISS

COMES NOW, the United States Attorney for the Southern District of Texas, Jennifer B. Lowery, through Assistant United States Attorney John M. Lewis and Britni Cooper, Assistant United States Attorneys, David L. Jaffe, Chief of the Organized Crime and Gang Section of the U.S. Department of Justice, Gerald Collins, Julie Finocchiaro, and Matthew Hoff, Trial Attorneys, and moves the Court to dismiss Counts One and Two of the Indictment in this case against defendants **JIMMY VILLALOBOS-GOMEZ** and **WALTER ANTONIO CHICAS-GARCIA** for the following reasons:

On August 24, 2022, a federal grand jury returned an indictment against defendant **WALTER ANTONIO CHICAS-GARCIA** (amongst other defendants) in Criminal Number 3:22-CR-0018. The charges in that indictment consolidate the counts in this case with additional counts.

On July 8, 2022, defendant **JIMMY VILLALOBOS-GOMEZ** pled guilty to a Superseding Information in Criminal Number 4:20-CR-585 that included the acts alleged in Counts One and Two of the Indictment in this case.

WHEREFORE, the United States respectfully requests the Court to grant this Motion and dismiss Counts One and Two of the Indictment in this case against defendants **JIMMY VILLALOBOS-GOMEZ** and **WALTER ANTONIO CHICAS-GARCIA**.

Respectfully submitted,

Jennifer B. Lowery
UNITED STATES ATTORNEY

/s/John M. Lewis

John M. Lewis
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2022, a copy of the United States' Motion and Proposed Order to Dismiss was delivered to Tom Berg and Julie Soderlund, Counsel for defendants **JIMMY VILLALOBOS-GOMEZ** and **WALTER ANTONIO CHICAS-GARCIA**, respectively, via email.

/s/John M. Lewis

John M. Lewis

Assistant United States Attorney

UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA

v.

JIMMY VILLALOBOS-GOMEZ,
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CRIMINAL NO. 4:20-CR-00472

ORDER

Upon the Motion of the United States and good cause shown, the Court finds that the interest of justice is served by granting this motion.

Therefore, it is ORDERED that the Government’s Motion to Dismiss Counts One and Two of the Indictment in this case against defendants **JIMMY VILLALOBOS-GOMEZ** and **WALTER ANTONIO CHICAS-GARCIA** is granted.

Signed on this _____ day of _____ 2022.

THE HONORABLE KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF TEXAS